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***New Hampshire Water Pollution Control Association
PO Box 95
Concord, New Hampshire 03301***

March 25, 2008

Mr. Carl Paulsen, Chair
Water Quality Standards Advisory Committee
New Hampshire Rivers Council
54 Portsmouth Street
Concord, NH 03301

Ref: Wastewater Treatment Facility Discharge Phosphorus Limitations

Dear Mr. Paulsen:

Through the New Hampshire Water Pollution Control Association's (NHWPCCA) liaison with the Water Quality Standards Advisory Committee, we have learned that consideration is currently being given to imposing what would be considered to be very strict limitations on the concentration of phosphorus allowed to be discharged from wastewater treatment facilities.

Based on information available within the wastewater industry and the experience of treatment plants in other parts of New England and in the U.S., achieving extremely low levels of phosphorus, while possible, is very costly in terms of construction and operations.

Of further concern within the industry is that it appears that to date a strong scientific basis justifying the low levels of phosphorus being proposed by regulatory agencies has not been established, and non-point sources have been shown to be more significant than point sources in many instances.

Given the above, the NHWPCCA urges that the adoption of limitations that would impose extremely low levels of phosphorus on wastewater treatment facility discharges be postponed until such time as the benefits of such levels can be clearly shown, to avoid the unnecessary expenditure of extremely high capital and operating costs with a potential of little measurable return on water quality.

Of interest is the fact that a similar position has been formally issued by NEWEA.

Respectfully submitted,

Edward L. Rushbrook, P.E.
President

cc: Paul Currier - NHDES
Paul Heirtzler - NHDES
Mike Sullivan - NHWPCCA
Donna Trask - NHWPCCA
Steve Clifton - NHWPCCA